

### REMARKS/ARGUMENTS

Claims 1-23 are pending in this application. Claims 1-23 stand rejected. Claims 1, 2, 11, and 19 have been amended and are supported by, for example, the Summary of the Invention on page 2. No new matter has been added. In view of the following remarks, reconsideration and allowance of all pending claims are respectfully requested.

#### **Objection to Drawings under 37 U.S.C. § 1.84(p)(4-5)**

Figures 3, 4, and 5 of the instant application have been corrected to remove the reference characters “300,” “400,” and “500” as required by the Office Action. Reference characters “320” and “440” are identified in the specification as “instruction 320” and “instruction 440,” respectively. Thus applicants believe that reference characters “320” and “440” in combination with the description in the specification would be understood by one of ordinary skill in the art to refer to different instances of a single entity (namely, instructions) and thus the figures need no correction. The specification has been amended to change one instance of reference character “410” to “440” where the reference character refers to instructions. The reference characters 310, 330, 410, 420, 430, and 450 clearly point to lexical text elements delimited by whitespace, metabackets, and other non-character symbols that, for example, a front-end lexical analyzer of a compiler is capable of parsing. Accordingly, the applicants believe the lead lines clearly point to lexical elements as described in the specification and thus the lead lines require no corrective action. No new matter has been added.

### **Objection to the Abstract**

The Office Action objected to the abstract by alleging the abstract does not accurately reflect the invention claimed. Applicants disagree because (among other reasons) the proper content of the abstract “is a concise statement of the technical disclosure of the patent and **should include** that which is new in the art to which the invention pertains” (emphasis added). This language is permissive and thus does not require that which is new in the art to which the invention pertains. Furthermore, the language of “should include” does not necessarily **exclude** information that is not new in the art to which the invention pertains. Accordingly, applicants request removal of the objection.

### **Objection to the Specification**

The specification of the instant application was objected to because a computer program listing contains more than 300 lines. Applicants have redacted the code and stored the code on a CD ROM. The CD file has been incorporated by reference by a paragraph added near the beginning of the amended specification. Applicants believe the objection to the amended specification should be removed.

### **Claim Objections**

The Office Action objected to claim 2 because the claim reads on a decision of determining a field type from between two mutually exclusive choices. The claim has been amended as suggested by the Office Action.

The Office Action objected to claims 3, 4, 14, 15, 21, and 22 because the term "richly formatted text" is not expressly defined in the application. Applicants traverse the assertion that applicants intended to refer to Microsoft Corporation's Rich Text Format (RTF) standard. Applicants believe that one of ordinary skill in the art would understand that the RTF standard is but one example of a format for "richly formatted text." Accordingly, applicants believe that no correction is required.

#### **Claim Rejections under 35 U.S.C. § 102(b)**

The Office Action rejected claims 1, 7, 9 and 10 under 35 USC 102 (b) as being clearly anticipated by Ayers, I., "AbiWord's Potential," Linux Gazette, Issue 43, July 1999, last downloaded by the Examiner on December 20, 2005, from: [www.linuxgazette.com/issue43/ayers.html](http://www.linuxgazette.com/issue43/ayers.html). downloaded pages 1-4, [hereinafter "Ayers"].

Regarding claim 1, applicants traverse the Office Action's assertion of the definition of "properties" as being used "in the general sense of the appearance of the text, irrespective of the font." On page 3, line 26 of the specification, "attribute" is defined as an additional **property** associated with an element. Thus, an "attribute" is an instance of the more general term "property" as understood by one of skill in the art, and is not limited to describing appearance of text, irrespective of the font.

Applicants traverse the rejection because Ayers fails to teach or suggest inputting an application document that has been generated by an application that uses a file format that is specific to the application. In contrast Ayers teaches a word processor that is configured to save

files in an XML format (or other common formats). Thus the file format is not specific to the application. Furthermore, Ayers does not teach determining properties relating to a field (complex or simple) of the application document and mapping the determined properties into at least one of a markup language element, an attribute, and a value because the fields are not derived from an application document using a file format that is specific to the application. Accordingly, claim 1 is believed to be allowable.

Claim 7 was rejected because Ayers allegedly teaches “the editing, or modification, of an XML document in AbiWord.” Claim 2 is believed to be allowable for at least the reasons given above for claim 1. In addition, applicants traverse the rejection because Ayers fails to teach or suggest determining an additional field from an application document using a file format that is specific to the application. Instead, Ayers teaches using inputting XML code, which is potentially universally readable by all word-processors capable of handling ASCII code. (For example, emacs, or even edlin, can be used to edit the XML code.) This is significant because Ayers does not determine field properties from an application document using a file format that is specific to the application. Accordingly, claim 7 is believed to be allowable.

Claim 9 was rejected because Ayers allegedly teaches “an AbiWord document is saved in an \*.abw file written in XML and that the files can be read by any text editor.” Claim 9 is believed to be allowable for at least the reasons given above for claim 1. In addition, applicants traverse the rejection because Ayers fails to teach or suggest that properties of the fields stored in the markup language document are understood by an application that understands the markup language when the field is not native to the application. Instead, Ayers teaches using inputting

XML code by all word-processors capable of editing and displaying ASCII code. The XML code is merely displayed and edited, and not parsed and acted upon, by the editor. For example, the emacs editor cannot "understand" the XML code that it is being used to edit. (Only the programmer can understand the XML code in such a case.) This is significant because CWRU does not determine and map field properties from an application document using a file format that is specific to the application. Accordingly, claim 9 is believed to be allowable.

Claim 10 is submitted to be allowable for at least the reasons given for claim 1.

#### **Claim Rejections under 35 U.S.C. § 103(a)**

The Office Action rejected claims 2-6, 8, and 11-23 under 35 U.S.C. 103(a) as being unpatentable over Ayers, I., "AbiWord's Potential," Linux Gazette, Issue 43, July 1999, last downloaded by the Examiner on December 20, 2005, from: [www.linuxgazette.com/issue43/ayers.html](http://www.linuxgazette.com/issue43/ayers.html). [hereinafter "Ayers"], in view of W3C, "XML Schema Part 0: Primer, W3C Recommendation, 2 May 2001," last downloaded by the Examiner on December 19, 2005, from: [www.w3.org/TR/2001/REC-xmlschema-0-20010502](http://www.w3.org/TR/2001/REC-xmlschema-0-20010502), downloaded pages 1-67, [hereinafter "XML Schema"], and further in view of W3C, "XML Schema Requirements, W3C Note 15 February 1999," last downloaded by the Examiner on December 19, 2005, from: [www.w3.org/TR/NOTE-xml-schema-req](http://www.w3.org/TR/NOTE-xml-schema-req), downloaded pages 1-5, [hereinafter "XML Requirements"].

Claim 2 is submitted to be allowable for at least the reasons given for claim 1.

Claims 3-6 are submitted to be allowable for at least the reasons given for claim 2.

Claim 8 is submitted to be allowable for at least the reasons given for claim 1. In addition Ayers, XML Schema, and XML Requirements, nor the Official Notice, do not singly, or in any motivated combination do not teach or suggest processing further fields when the properties associated with all fields have not been stored in the markup language document. Instead, the auto-archive and save file functions saves the information in a file. This is significant because the cited references do not determine field properties from an application document using a file format that is specific to the application and subsequently process all of the fields for storage in a markup language format. Accordingly, claim 8 is believed to be allowable.

Claim 11, as amended, is submitted to be allowable for at least the reasons given for claim 1.

Claim 12 is submitted to be allowable for at least the reasons given for claim 9.

Claim 13 is submitted to be allowable for at least the reasons given for claim 10.

Claim 14 is submitted to be allowable for at least the reasons given for claim 3.

Claim 15 is submitted to be allowable for at least the reasons given for claim 4.

Claim 16 is submitted to be allowable for at least the reasons given for claim 5.

Claim 17 is submitted to be allowable for at least the reasons given for claim 6.

Claim 18 is submitted to be allowable for at least the reasons given for claim 7.

Claim 19, as amended, is submitted to be allowable for at least the reasons given for claim 11.

Claim 20 is submitted to be allowable for at least the reasons given for claim 9.

Claim 21 is submitted to be allowable for at least the reasons given for claim 3.

Claim 22 is submitted to be allowable for at least the reasons given for claim 4.

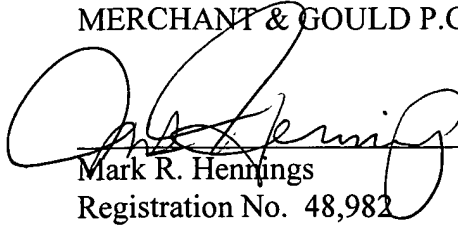
Claim 23 is submitted to be allowable for at least the reasons given for claim 10.

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

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Respectfully submitted,

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